

**UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO**

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In re:  THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,  as representative of  THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i> ,  Debtors. <sup>1</sup>	PROMESA Title III Case No. 17 BK 3283-LTS (Jointly Administered)
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**INFORMATIVE MOTION OF SERVICE EMPLOYEES INTERNATIONAL  
UNION AND INTERNATIONAL UNION, UAW REGARDING  
APPEARANCE OF COUNSEL AT CONFIRMATION HEARING**

To the Honorable United States District Court Judge Laura Taylor Swain:

Parties-in-interest Service Employees International Union (“SEIU”) and International Union, United Automobile, Aerospace and Agricultural Implement Workers of America (“UAW”) submit this informative motion in compliance with paragraph 4(a) of the Court’s October 14, 2021 *Order Regarding Procedures for Hearing on Confirmation of Plan of Adjustment* (“Order”) [Docket Entry #18502] and respectfully state as follows:

Peter D. DeChiara of Cohen, Weiss and Simon LLP, whose email address is pdechiara@cwsny.com, will appear on behalf of SEIU and UAW at the November 8, 2021

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3566-LTS); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

confirmation hearing. Mr. DeChiara will present an opening argument in opposition to confirmation of the Plan of Adjustment. SEIU and UAW do not intend to assert any disputes over material facts, nor do they intend to cross-examine any declarant or present live rebuttal testimony. As directed by the Court's Order, we attach hereto the Party Appearance Sheet, Witness Cover Sheet, and Exhibit Cover Sheet, as Exhibit A, Exhibit B, and Exhibit C.

SEIU and UAW reserve the right to amend, supplement or modify the foregoing in the event of any material change to the plan of adjustment or proposed confirmation order, or to circumstances relevant to the confirmation process.

Dated: October 20, 2021

**COHEN, WEISS AND SIMON LLP**

By: /s/ Peter D. DeChiara  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 20th day of October 2021, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF System, which will notify all counsel of record.

/s/ Marie B. Hahn

Marie B. Hahn